

The following additional information and clarifications were requested by Commission staff with regard to the CM Tel (USA) LLC International Section 214 Transfer of Control Application (ITC-T/C-20080913-00428) filed on September 13, 2008.

### **Supplemental Answer to Question 11**

Exhibit A to Attachment 1 shows that 39% of CITIC 1616 Holdings Limited is owned by "Others." CM Tel (USA) LLC and Pacific Networks Corp. ("Pacific Networks") confirm that no individual or entity in the "Other" group will directly or indirectly own 10% or greater of CM Tel (USA) LLC. In addition, other than those entities and individuals provided in Attachment 1, no other entity or individual holds 10% or greater direct or indirect equity or controlling interest in CM Tel (USA) LLC or in Pacific Networks Corp.

### **Supplemental Answer to Question 12**

In addition to the information provided, staff has requested the following information for Mr. Yuen Kee Tong and Mr. David Chan Tin Wai, directors of both Pacific Networks and CITIC Telecom 1616 Limited, a Hong Kong telecommunications provider.

#### **Yuen Kee Tong**

Address: 8/F, CITIC Tower  
1 Tim Mei Avenue, Central  
Hong Kong  
Principle Business: Executive Management  
Citizenship: United Kingdom

#### **David Chan Tin Wai**

Address: 8/F, CITIC Tower  
1 Tim Mei Avenue, Central  
Hong Kong  
Principle Business: Executive Management  
Citizenship: United Kingdom

### **Supplemental Answer to Question 15**

Upon grant of the transfer of control application and acquisition of CM Tel (USA) LLC by Pacific Networks, CM Tel (USA) LLC undertakes to operate pursuant to the conditions set forth in the Assurances Letter dated September 2, 2008 from Pacific Networks to the U.S. Department of Homeland Security and the U.S. Department of Justice.